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States Government

Department of Energy

DUE
DATE 6-15-91

Memorandum

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Rocky Flats Office

ACTION Kersh

DIST.	LTR	ENC
BETZKE, J.C.		
BRLINGAME, A.H.		
OPP, R.D.		
BOUCHER, D.W.		
AVIS, J.G.		
VERED, J.E.	X	
ERRERA, D.W.		
RRIS, L.B.		
RAI, OR, F.J.		
RANCIS, G.E.		
OODWIN, R.		
EALY, T.J.		
EKER, E.H.		
NS, J.P.		
ELE, P.B.		
ERSH, J.M.	X	
RB, W.A.		
RKEBO, J.A.		
E, E.M.		
AJESTIC, J.R.		
ATHEWS, T.A.		
EURRENS, B.E.		
ORGAN, R.V.	X	
ORTH, P.		
ALMER, L.A.		
ZZUTO, V.M.		
OTTER, G.L.	X	
HOADES, J.L.	X	
AFELL, B.F.		
WANSON, E.R.		
IEBE, J.S.		
ILKINSON, R.B.		
ILLIAMS, R.E.		
ILSON, J.M.		
OUNG, E.R.		
ANE, J.O.		
ndt	m	X
sky	w	X
lger	p	X
ngman	j	X
ter	r	X
mith	dm	X
reengard	t	X

MAY 20 1991

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

WMED:CF:3962

Groundwater and Air Monitoring Programs at Rocky Flats Plant

John M. Kersh, Associate General Manager
Environmental Restoration & Waste Management
EG&G Rocky Flats, Inc.



We have received your memoranda (91-RF-1953 and 91-RF-2446) discussing groundwater and air monitoring programs at the Rocky Flats Plant (RFP). While we appreciate the fact that you recognize the importance of improving monitoring program efficiency, the information provided is not sufficiently detailed to assist us in reaching an understanding of where monitoring programs can be revised.

Groundwater Monitoring:

We were pleased that you took the time to review the existing groundwater monitoring program to the point where you could make recommendations for program revisions. However, more information is needed prior to obtaining RFO concurrence. Some of this information is available in your Draft Groundwater Protection & Monitoring Program Plan; however, it needs to be presented in one complete package. Additional needs are:

1. A map showing all wells, coded to identify purpose (RCRA, CERCLA, etc.) and proposed monitoring changes (change in frequency, abandonment, etc.);
2. A tabulation listing all wells by purpose, and comparing current with proposed well use, frequency of sampling and parameters analyzed;
3. Written confirmation that the proposed monitoring system revisions will not result in regulatory noncompliance;
4. A determination of cost savings; and
5. A schedule for implementing proposed changes.

Air Quality Monitoring:

We found the Regulatory analysis of Rocky Flats Plant Air Surveillance Program to be unsatisfactory with regard to the intended purpose of evaluating options to improve the efficiency of the air monitoring program, as outlined in 91-RF-1953. No recommendations were offered; no evidence of any evaluation to improve monitoring program efficiency was given. At our March 1, 1991, meeting, EG&G agreed to examine the stack sampling

Reviewed for Addressee
Corres. Control RFP

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program (to include such things as analytical costs, sample composition, etc.) to see if there were ways to improve cost efficiency, without resulting in violation of any requirement. This was not done in 91-RF-2446. Please rework this assessment to indicate whether or not program efficiencies can be realized. Some additional specific comments are:

1. You cite 40 CFR 58, Appendix B, PSD Monitoring and discuss the TSP and PM10 methods; however, in the draft Air Quality Management Plan it is stated that RFP is not a PSD source at this time. If RFP is not a PSD source, it needs to be explained why sampling is being done.
2. Draft Order 5400.XY: This Order has been superseded by the publication "Environmental Regulatory Guide for Radiological Effluent Monitoring and Environmental Surveillance," dated January 1991.
3. Part of the reference to the Agreement in Principle, namely "DOE will install continuous emission monitors in all appropriate sources to ensure continuous compliance with air pollution requirements" is improperly placed under the "ambient" monitoring heading. It should be included under the "effluent" monitoring heading.

Environmental Monitoring Plan (EMP):

We concur that the EMP is the appropriate place to describe all proposed monitoring program modifications. However, we want to emphasize the need for individual monitoring program managers to participate in the development of that plan.

Please address the issues raised in this memorandum and provide the revised information back to this office by June 15, 1991. If you have any questions, please call Tom Lukow of my staff on extension 4561.


David P. Simonson
Assistant Manager
for Environmental Management